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3 Honorable Marsha J. Pechman  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 DAI TRONG TRAN, et al.,

13 Defendant.

14 NO. CR07-0118 MJP

15 STIPULATED MOTION TO  
16 CONTINUE MOTIONS DEADLINE

17 United States of America, through Lisca Borichewski, Assistant United States  
18 Attorney (“Plaintiff”) and defendant, Dai Trong Tran, stipulate, upon request of Defendant  
19 Tran, to continue the pretrial motions deadline in this matter, currently set for April 26,  
20 2007, to May 17, 2007.

21 In support of this request for continuance the parties respectfully request that the  
22 Court consider the following:

- 23 1. This matter has not been continued.  
24 2. This is a multi-defendant case alleging conspiracies to import and  
distribute marijuana and to engage in money laundering.

STIPULATED MOTION

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3. Counsel for defendant Tran was just retained in this matter and has not had an opportunity to review any of the discovery.
4. This Motion is not made for the purpose of delay, or for any other improper motive, but is instead made based upon a good faith belief by defense counsel that such a continuance is necessary so that counsel can prepare this case.

WHEREFORE, and by reason of the above and foregoing, counsel respectfully moves this Court for its order, judgment and decree continuing the Motion filing deadlines in this case until May 17, 2007.

Dated this 26<sup>th</sup> day of April, 2007.

Respectfully submitted,

Dai Trong Tran represented by;  
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s/ Jeffrey Steinborn, PLLC  
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## ORDER

This matter comes before the Court on a stipulated motion by the parties to continue the pretrial motions due date and the trial date, and the Court having considered the entirety of the record and files herein, the Court finds as follows:

1. This case is both unusual and complex. Failure to grant the requested continuances would likely result in a miscarriage of justice.
  2. The Court finds that it is unreasonable for defense counsel to complete review of the discovery and to adequately prepare any pretrial motions by the original cut-off date.
  3. The Court further finds that the interests of the public and the defendant in a speedy trial in this case are outweighed by the ends of justice. Now, therefore,

IT IS HERBY ORDERED that the pretrial motions due date be continued from April 26, 2007 to , 2007.

Done this \_\_\_\_\_ day of April, 2007.

**HONORABLE MARSHA J. PECHMAN  
UNITED STATES DISTRICT JUDGE**

Presented by:

s/ Jeffrey Steinborn, PLLC  
Counsel for Dai Trong Tran  
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2                   CERTIFICATE OF SERVICE  
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4                   I HEREBY CERTIFY that on the 26<sup>th</sup> day of April, 2007, I electronically filed the  
5 foregoing Stipulated Motion with the clerk of the court using the CM/ECF system which  
6 will send notification of such filing to the attorney(s) of record for the defendant(s). I  
7 hereby certify that I have served any other parties of record that are non CM/ECF  
8 participants via Tele-fax/US postal mail.

9                   Dated this 26<sup>th</sup> day of April, 2007.  
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11                   \_\_\_\_\_  
12                   s/  
13                   Tracee Tomich, Legal Assistant  
14                   JEFFREY STEINBORN, PLLC  
15                   Counsel for the Defense  
16                   1800 Seattle Tower  
17                   1218 Third Avenue  
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